



Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of)

Waiver Request of FCC Form 472 BEAR)
Invoicing Deadline Date Appeal to USAC)

Las Vegas West School District)
BEN 143288)

CC Docket No. 02-6

Schools and Libraries Universal Service)
Support Mechanism)

Dear FCC,

I am requesting a waiver of the FCC Rules to file an Appeal with USAC within 60-days for the Form 472 BEAR Invoicing Deadline Date. I hereby appeal the Administrator's Decision on Denial of Appeal.

As you can see by the attached records, I was two days late in filing the appeal to USAC for a deadline extension due to the denial of BEAR Form 472, Invoice #2843293 on November 2, 2018 (after the 10/28/18 invoicing deadline). The denial was due to a clerical error inputting the incorrect "Billed Date". The services in question were for two separate FRN's for the same internet access but only for certain months of the funding year, which turned into a very confusing and frustrating application for the School District during 2017.

The only defense for the tardiness is overlooking the filing deadline date and time mismanagement on my part. I was in no way intentionally ignoring the appeal deadline.

I understand that the FCC rules are in place for a reason and the filing of the appropriate forms in a timely manner is important to the workflow of the organization. I am respectfully requesting the FCC's mercy in granting a waiver for missing this deadline and giving the School District the opportunity to resubmit the invoice to USAC as E-rate funds are imperative to the district's budget.

Thank you for your consideration.

Sincerely,

Karen Pulliam
ICC – E-rate Consulting on behalf of
Las Vegas West School District
kpulliam@icc-psd.com
505-220-7275



Schools and Libraries Division

Form 472 (BEAR) Notification Letter

November 2, 2018

Launa Waller
Plateau Telecommunications, Inc
7111 N Prince St
Clovis, NM 88101

Re: Invoice Number - as assigned by USAC: 2843293
Service Provider Identification Number: 143004077
Reimbursement Form Number: BEAR Plateau 17 4 mos.
Billed Entity Number: 143288

Pulliam Karen
LAS VEGAS WEST SCHOOL DISTRICT
7425 Las Colinas PI NE
Albuquerque, NM 87113

Preferred Mode of Contact: E-mail at kpulliam@icc-psd.com
Total Amount of Reimbursement Approved for Payment: \$0.00

This letter is your notification that the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has processed an FCC Form 472, "Billed Entity Applicant Reimbursement (BEAR)" Form from the above named applicant listing you as the service provider. USAC has committed to reimburse the discounted portion of the cost of eligible services provided to eligible entities pursuant to one or more FCC Forms 471, "Description of Services Ordered and Certification Form".

In certain instances, a line may not have been paid. Review the BEAR Letter Applicant Reimbursement Report (Report) following this letter for the reason(s) this may have occurred. For more information about lines that have not been paid, see the explanation of Invoice Error Codes in Step 9 on our website. Work with the applicant (your customer) to correct any errors. Once corrected, your customer may submit a new BEAR using the BEAR Online tool from the Apply Online area or Required Forms section of our website to request reimbursement for any unpaid lines.

If a new BEAR cannot be submitted before the invoice deadline passes, you or your customer may submit a request for a deadline extension. (See "Invoice Deadlines and Extension Requests" posted in the SLD section of our website for more information.)

TO APPEAL THIS DECISION:

If you wish to appeal a decision in this letter to USAC, your appeal must be received

BEAR NOTIFICATION LETTER APPLICANT REIMBURSEMENT REPORT

Form 471 Application Number: 171040876

Funding Request Number: 1799092573

Funding Year 2017: 07/01/2017 - 06/30/2018

Contract Number:

Funding Commitment Decision: \$16361.79

Reimbursement Amount for this FRN: \$0.00

Reimbursement Request Decision Explanation:

Billed Date Before 486 Service-Start Date;

Records / Appeals

Plateau partial year BEAR denial - wrong date - #131434

Summary Associated FRNs News Related Actions



Appeal Information

View Status (+)

Funding Year 2017

Submitting Organization LAS VEGAS WEST SCHOOL DISTRICT (BEN: 143288)
Created By Karen Pulliam
Created On 1/3/2019 10:57 AM EST

Main Contact

Name Karen Pulliam
Phone Number 505-220-7275
Email kpulliam@icc-psd.com

Narrative

Invoice #2843293 was denied due to incorrect billed date. Notification letter was sent after the invoice deadline. Deadline extension was also denied due to late filing. Can I please submit a new BEAR for this FRN with the corrected "customer billed date"? Thank you for your consideration.

Appeal Details

Decision appealed by applicant FCC Form 472 (BEAR) Notification Letter

If you wish to modify or cancel your appeal, or, if you have any questions about your appeal, please contact the E-rate Program's Client Service Bureau (CSB) at (888) 203-8100.

View Supporting Documentation (-)

Supporting Documentation

Document ID	Document	Description	Upload Stage	Uploaded By	Uploaded On
48583	APPEAL BEAR NL Denial and ext. denial supporting documentation.pdf	BEAR NL dated after deadline	Intake	Karen Pulliam	1/3/2019 10:58 AM EST

 SAVE DRAFT

Request an extension: Invoice Deadline Date

For your records, a News Post and corresponding email will be sent to you with the details of this submitted IDD extension request #5041.

Approved for an IDD extension

The funding request number(s) listed below have been approved for an extension to the Invoice Deadline Date.

Funding Request Number	FRN Nickname	Service Delivery Deadline	Original Invoice Deadline Date	Extended Invoice Deadline Date	BEN	SPIN
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Denied for an IDD extension

The funding request number(s) listed below have been denied for an extension to the Invoice Deadline Date. Please review the reason below for more information.

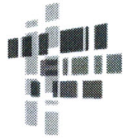
Funding Request Number	FRN Nickname	Reason for Denial	Service Delivery Deadline	Invoice Deadline Date	BEN	SPIN
1799092573	Lit Fiber Valley Schools 200 mbps.	This FRN has already passed its original IDD	6/30/2018	10/29/2018	143288	143004077

Ineligible for an IDD extension

The funding request number(s) listed below are not eligible for an Invoice Delivery Deadline extension. Please review the reason below for more information.

Funding Request Number	FRN Nickname	Reason for Ineligibility	Service Delivery Deadline	Invoice Deadline Date	BEN	SPIN
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No items available



BEN Name: LAS VEGAS WEST SCHOOL DISTRICT

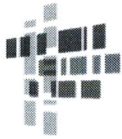
BEN: 143288

Post Commitment Wave: 49

Revised Funding Commitment Decision Overview

Funding Year 2017

Funding Request Number (FRN)	Service Provider Name	Request Type	Revised Committed	Review Status
1799092573	Plateau Telecommunications, Inc	Appeals	\$16,361.79	Denied



BEN Name: LAS VEGAS WEST SCHOOL DISTRICT

BEN: 143288

Post Commitment Wave: 49

Post Commitment Request Number: 131434	Post Commitment Request Type: Appeals	Post Commitment Decision: Denied
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FRN: 1799092573	Service Type: Data Transmission and/or Internet Access	Original Status: Funded	Revised Status: Funded
FCC Form 471: 171040876			

Dollars Committed			
Monthly Cost		One-Time Cost	
Months of Service	7		
Total Eligible Recurring Charges	\$18,179.77	Total Eligible One Time Charges	\$0.00
Total Pre-Discount Charges		\$18,179.77	
Discount Rate		90.00%	
Revised Committed Amount		\$16,361.79	

Dates	
Service Start Date	12/1/2017
Contract Expiration Date	6/30/2019
Contract Award Date	5/8/2017
Service Delivery Deadline	6/30/2018
Expiration Date (All Extensions)	

Service Provider and Contract Information	
Service Provider	Plateau Telecommunications, Inc
SPIN (498ID)	143004077
Contract Number	
Account Number	
Establishing FCC Form 470	170080039

Consultant Information	
Consultant Name	Karen Pulliam
Consultant's Employer	International Computer Corporation
CRN	16062109

Revised Funding Commitment Decision Comments:
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Post Commitment Rationale:

Our records show that your appeal was filed more than 60 days after the date your decision letter was issued. Your appeal was filed on 1/3/2019. The Form 472 (BEAR) Notification Letter was issued on 11/2/2018. Federal Communications Commission (FCC) rules require appeals to be filed within 60 days of the date on the decision letter being appealed. FCC rules do not permit the Universal Service Administrative Company (USAC) to consider your appeal.